

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SECURITIES AND EXCHANGE COMMISSION, §
§
V. § Case No. 6:23-cv-00321
§
ROY W. HILL, et al. §

MOTION TO APPROVE VEHICLE SALE PROCEDURES AND BROKER RETENTION

Receiver Albert C. Black III moves to approve procedures and a broker to sell certain vehicles owned by Defendant Clean Energy Technology Association, Inc. (“CETA”), respectfully stating:

Introduction

1. The Receiver believes it has become apparent that the assets of CETA will ultimately be liquidated and distributed back to the CETA investors. As such, the Receiver believes it is appropriate to liquidate certain CETA company vehicles. These are wasting assets. Accordingly, the Receiver seeks approval of procedures to sell the vehicles and the retention of a broker.

Authorities

2. It is well settled that this Court has authority to direct that vehicles be sold by Receiver. *E.g., SEC v. Provident Royalties, LLC*, Case No. 3:09-cv-1238-L-BH, Doc. 109, at 4 (motion) & Doc. 135 (order) (N.D.Tex. – Feb. 9, 2010 & Mar. 9, 2010).

Proposed Procedures and Broker

3. The Receiver has consulted with Oak Cliff Motor Company in respect of the vehicles listed on the following chart:

| VIN | Make & Model | Kelly Blue Book Auction Value |
|-------------------|------------------------------|-------------------------------|
| 1FTFW1E51PFB24756 | 2023 Black Ford F-150 STX F4 | \$24,855.00 |
| 1FTEW1E46LKD49226 | 2020 Black Ford F-150 STX | \$19,215.00 |
| 1FTEX1EP7GKD29922 | 2016 Black Ford F-150 Sport | \$10,815.00 |
| 1FT8W3BN2NED73062 | 2022 Black Ford F-350 STX | \$26,475.00 |
| 1FTEW1EP4NKE72388 | 2022 Black Ford F-150 STX | \$22,890.00 |
| 1FT8W3BN6NEE65694 | 2022 Black Ford F-350 STX | \$26,475.00 |
| 4JGDF6EEXHA876034 | 2017 Mercedes GLS450 WAGON | \$11,085.00 |
| W1K2J5KBOMA089785 | 2021 Mercedes CLS 450 4MATIC | \$29,775.00 |
| W1N0G8DB7MV320889 | 2021 Mercedes GLC 300 | \$18,330.00 |
| 4JGDA5GB5HA876986 | 2017 Mercedes GLE | \$15,060.00 |
| 4JGDF7CE9EA274634 | 2014 Mercedes GL-450 | \$9,165.00 |

4. Oak Cliff Motors is a small vehicle wholesale dealer located in Dallas, Texas.

5. The Receiver proposes this dealer market these vehicles at their retail values, and that each vehicle must sell for a value no less than the wholesale values listed above. If such values can be obtained, the Receiver proposes the dealer be compensated in the form of a 10% commission. This commission will cover all costs of detailing vehicles, marketing, car fax reports, digital ads, and closing transactions.

WHEREFORE, the Receiver prays the Court approve the liquidation of the vehicles on the terms stated above by Oak Cliff Motors.

Respectfully submitted,

/s/ Dennis Roossien
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COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify the Receiver attempted to confer with opposing counsel on February 2, 2024 after incorporating opposing counsel's request to revise the motion, but opposing counsel did not respond to the Receiver's final attempt to confer.

/s/ Dennis Roossien _____

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2024, a true and correct copy of the foregoing instrument was served electronically in compliance with the Court's Electronic Filing Procedures on all counsel of record who are deemed to have consented to electronic service.

/s/ Dennis Roossien _____

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